

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

STATE OF WASHINGTON, et al.,

NO.

Plaintiffs,

DECLARATION OF  
TIMOTHY H. DELLIT, MD

V.

DONALD J. TRUMP, in his official capacity as President of the United States of America, et al.,

## Defendants.

DECLARATION OF TIMOTHY H.  
DELLIT, MD

ATTORNEY GENERAL OF WASHINGTON  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
(206) 464-7744

1 I, Timothy H. Dellit, declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and attest to  
 3 the information set forth below through personal knowledge as well as though University of  
 4 Washington (UW) personnel who have assisted me in gathering this information from our  
 5 institution.

6 2. I am the Chief Executive Officer (CEO) of UW Medicine, Executive Vice  
 7 President for Medical Affairs, and Paul G. Ramsey Endowed Dean of the UW School of  
 8 Medicine. I have held that position since 2023. I served previously as Chief Medical Officer for  
 9 UW Medicine, Executive Vice Dean for Clinical Affairs for the School of Medicine, Vice  
 10 President for Medical Affairs for UW, and President of UW Physicians, the physician group  
 11 practice for faculty in the School of Medicine. I earned my medical degree from Cornell  
 12 University Medical College and am board-certified in both Infectious Diseases and Internal  
 13 Medicine.

14 3. UW Medicine is an integrated clinical, research and learning health system with  
 15 a single mission to improve the health of the public. UW Medicine is a family of organizations  
 16 that are operated or managed as part of an integrated health system. These organizations include  
 17 UW Medical Center (Montlake and Northwest campuses), UW Medicine Primary Care, the UW  
 18 School of Medicine, UW Physicians, Harborview Medical Center, and Airlift Northwest.

19 4. As Dean of the School of Medicine, I oversee one of the nation's leading medical  
 20 schools. The UW School of Medicine is a leader in regional medical education and conducts  
 21 world-leading research across 31 clinical and biomedical research departments and multiple  
 22 research institutes and centers with areas of focus including behavioral health, neuroscience and  
 23 Alzheimer's disease, heart disease and stroke, infectious diseases, cancer, health metrics,  
 24 genomics and precision medicine, protein design and regenerative medicine.

1           **UW School of Medicine's Commitment to Biomedical Research**

2           5.     From making kidney dialysis possible to winning the Nobel Prize for bone-  
 3 marrow transplantation and most recently, the Nobel Prize for computational protein design,  
 4 UW Medicine has a long tradition of leading-edge research that has yielded some of the most  
 5 important innovations in the history of modern medicine.

6           6.     UW School of Medicine houses a robust research program with more than 1,000  
 7 faculty investigators, along with numerous students and trainees who also participate in the  
 8 School of Medicine's research. Its faculty includes many members of the National Academy of  
 9 Sciences, the National Academy of Medicine, and the Howard Hughes Medical Institute as well  
 10 as recipients of Nobel, Gairdner, Lasker, and Shaw prizes. UW Medicine researchers explore  
 11 every aspect of health and disease, from the molecular mechanisms of gene action to population  
 12 studies of global illnesses and cancers.

13           7.     In federal fiscal year 2024, UW School of Medicine received \$494 million in  
 14 federal research grants, of which \$388 million were direct awards and \$105 million were  
 15 subcontracts. Of the \$494 million, \$417 million were federal research grants from the United  
 16 State Health and Human Services (HHS). These federal research grants covered a wide range of  
 17 topics including allergy and infectious disease research (\$76 million); cancer research (\$27  
 18 million); diabetes, digestive & kidney research (\$25 million); and cardiovascular disease  
 19 research (\$18 million).

20           8.     UW School of Medicine currently has direct research grants from the following  
 21 federal agencies: Department of Agriculture, Department of Commerce, Department of Defense,  
 22 Department of Education, Department of Energy, Department of Health and Human Services,  
 23 Department of Veterans Affairs, National Aeronautics & Space Administration, National  
 24 Science Foundation, and Office of the Director of National Intelligence.

9. Federal research grants have enabled incredible medical advances by UW School of Medicine faculty, including these recent developments:

- Identification of how a new area of the brain is impacted by Alzheimer's disease, potentially allowing for an earlier diagnosis via MRI (NIH and VA);
- Development of a new gene therapy treatment for Duchenne muscular dystrophy (NIH);
- Development of a new care model to treat pain more effectively for traumatic brain injury patients (NIH);
- Development of a new electrical stimulation device to help restore hand function after spinal cord injury (NSF);
- New understanding of how X chromosome gene inactivation may protect women from autism disorder (NIH);
- Identification of new markers that can be measured in a blood test to determine the best way to treat aggressive forms of skin cancer (NIH);
- Identification of new markers that predict diabetic kidney disease in young adults with type 2 diabetes (NIH); and
- Identification of new cells in the brain that contribute to unexplained chronic pain, providing insights for treatment (NIH).

10. UW Medicine ranks among the top academic research institutions to receive National Institutes of Health (NIH) funding. In federal fiscal year 2024, for instance, NIH funded approximately 650 UW School of Medicine grants.

11. UW School of Medicine invests a significant amount of time and resources in the federal research grant application process. Simply preparing an NIH grant typically involves a one-to-two-year process of conducting background research, gathering data, and running pilot experiments. Preparing the grant application is often a multi-month process that frequently requires coordination across the institution. Thereafter, the grants are reviewed by other experts

1 in the field and the grants receiving the top scores by review panels are recommended for funding  
 2 (typically top 10-15% at NIH, although some federal agencies fund even fewer). The Council  
 3 for each NIH Institute makes the final decision, which typically takes about nine months to  
 4 receive. If a proposal is not funded, the research grant's scores and comments from the grant's  
 5 reviewers are available about five to six months after the proposal is submitted, which  
 6 researchers then use to perform additional experiments, revise their applications and submit  
 7 again (restarting the nine-month clock). If a proposal is funded, NIH grants typically range in  
 8 length from two year to five years, although they are sometimes longer depending on the type of  
 9 research. Researchers normally submit progress reports annually and receive annual funding  
 10 approval as long as progress is being made.

11 12. UW School of Medicine depends upon the continued availability of the federal  
 12 research grants awarded to the school to continue its groundbreaking medical research.

13 **UW Medicine Provides Gender-Affirming Care**

14 13. UW Medicine strives to provide patient-centered and inclusive care to all  
 15 patients, including to transgender and gender non-binary patients.

16 14. UW Medicine's Transgender and Gender Non-Binary Health Program provides  
 17 gender-affirming medical care coordinated across a range of clinicians in the UW Medicine  
 18 system to its adult patients. When medically indicated and consistent with practice guidelines  
 19 and standards of care, including those from the World Professional Association for Transgender  
 20 Health and the Endocrine Society, UW Medicine offers a full range of gender-affirming surgical  
 21 care for its adult patients, age 18 and older.

22 15. The UW School of Medicine Department of Pediatrics trains pediatric-focused  
 23 clinicians and advances research to improve the health of all children and adolescents.  
 24 Department faculty physicians provide primary and specialty pediatric care, including gender-  
 25 affirming medical care, to minor patients when medically indicated and necessary to serve the  
 26 patients' health needs.

1       16.    Gender-affirming medical care for patients under age 18 requires consent from a  
 2 parent or guardian that has medical decision-making rights for that patient, unless the patient is  
 3 an emancipated minor.

4 **Harms to UW Medicine from Executive Order 14187**

5       17.    I am familiar with Executive Order (EO) 14187, entitled “Protecting Children  
 6 from Chemical and Surgical Mutilation” EO 14187.

7       18.    As described above, UW School of Medicine receives hundreds of millions of  
 8 dollars in medical research grants from the Federal Government annually. These medical  
 9 research grants support operational and capital expenses including researchers, labs, and  
 10 equipment. UW School of Medicine attracts students, research staff, and faculty based on its  
 11 reputation as a leader in biomedical research. The ability of UW School of Medicine to achieve  
 12 its educational, research, and health care mission would be significantly impaired if it were  
 13 suddenly stripped of federal research or education grants under EO 14187.

14       19.    Public health would also be harmed. The research being conducted by UW School  
 15 of Medicine materially advances the science of medicine. If federal research grant funding to  
 16 UW School of Medicine is suddenly frozen or ended, key research projects would be left  
 17 unfinished, putting future medical treatments and breakthroughs at risk of not being developed  
 18 or discovered. This includes more than 650 NIH grants and other health research projects  
 19 covering a broad range of studies including Alzheimer’s disease, cancer, diabetes, liver disease,  
 20 cardiovascular disease, autism and neurodevelopment disorders, asthma, opioid use disorder,  
 21 kidney disease, sleep apnea, Down Syndrome, and organ transplantation.

22       20.    Executive Order 14187 puts UW School of Medicine in an impossible position.  
 23 One of the goals of the UW School of Medicine is to meet the healthcare needs of the region,  
 24 which includes providing medical care to underserved populations. Consistent with this  
 25 commitment, we provide patient-centered and inclusive care, which includes gender-affirming  
 26 care to treat gender dysphoria. Ceasing to provide health care to treat gender dysphoria, would

1       undermine the UW School of Medicine's mission and its ethical duties to its patients and to the  
 2       community that it serves. At the same time, EO 14187 forces UW School of Medicine to risk  
 3       losing hundreds of millions of dollars in federal research grants simply because it provides lawful  
 4       healthcare services, consistent with the standards of care, to underserved populations.  
 5       UW School of Medicine cannot simply stand by and wait for the Federal Government to begin  
 6       "immediately" stripping it of the hundreds of millions of dollars in medical research grants based  
 7       on the provision of lawful healthcare services.

8       21.      I am aware, for instance, that on January 31, 2025, at approximately 1:08 p.m., a  
 9       researcher at the UW School of Medicine received an email with a message from the Health  
 10      Resources and Services Administration (HRSA) advising that "[e]ffective immediately, HRSA  
 11      grant funds may not be used for activities that do not align with Executive Orders (E.O.) entitled  
 12      Ending Radical and Wasteful Government DEI Programs and Preferencing, Initial Rescissions  
 13      of Harmful Executive Orders and Action, Protecting Children from Chemical and Surgical  
 14      Mutilation, and Defending Women from Gender Ideology Extremism and Restoring Biological  
 15      Truth to the Federal Government (Defending Women)," and "[a]ny vestige, remnant, or  
 16      re-named piece of any programs in conflict with these E.O.s are terminated in whole or in part,"  
 17      and further advising "[y]ou may not incur any additional costs that support any programs,  
 18      personnel, or activities in conflict with these E.O.s." Besides listing those EOs, which includes  
 19      EO 14187, the email message did not provide other basis for restricting or terminating funding.  
 20      A true and correct copy of that email is attached to my declaration as **Exhibit 1**. UW School of  
 21      Medicine has research grants totaling approximately \$11.8 million from HRSA. I am also aware  
 22      that HRSA rescinded that email on Wednesday, February 5, 2025, at approximately 11:54 a.m.,  
 23      simply stating "HRSA rescinds the notice titled "Important Message for HRSA Award  
 24      Recipients" that was sent to all HRSA grantees on January 31, 2025." A true and correct copy  
 25      of that email is attached to my declaration as **Exhibit 2**. These abrupt emails on how the  
 26      President's Executive Orders will restrict UW School of Medicine's federal funding furthers a

1 climate of chaos and fear for our professors and researchers on what federal agencies will do  
 2 next.

3 22. I am not aware of UW School of Medicine having ever received federal grant  
 4 funding contingent upon UW Medicine *not* providing its patients a particular type of medically  
 5 indicated treatment or care, which is what EO 14187 does.

6 23. EO 14187 also impairs UW School of Medicine's mission by threatening federal  
 7 prosecution for providing medically necessary health care. UW Medicine Executives have  
 8 spoken to faculty who provide gender-affirming medical care in the days since EO 14187 was  
 9 issued, and I am aware that many fear criminal investigation by the Federal Government. The  
 10 broad language of EO 14187 has created this fear even though our physicians have done nothing  
 11 other than provide necessary healthcare services that are consistent with the standard of care and  
 12 protected under Washington law.

13 I declare under penalty of perjury under the laws of the State of Washington and the  
 14 United States of America that the foregoing is true and correct.

15 DATED this 6th day of February 2025 at Seattle, Washington.

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17 TIMOTHY H. DELLIT, MD  
 18 CEO, UW Medicine  
 19 Executive Vice President for Medical Affairs,  
 University of Washington  
 20 Paul G. Ramsey Endowed Dean, University of  
 Washington School of Medicine

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